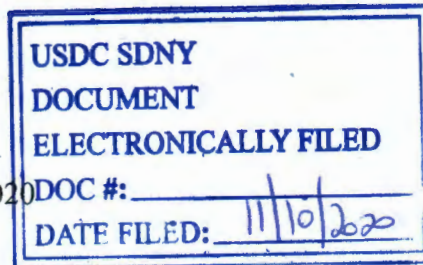


PG PERRY GUHA LLP

PETER A. GWYNNE  
212-399-8352 PHONE  
pgwynne@perryguha.com EMAIL

November 6, 2020

BY ECF

The Honorable Colleen McMahon  
Chief Judge  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Room 2250  
New York, New York 10007

MEMO ENDORSED

11/10/2020

Extension  
Granted

A handwritten signature in black ink, appearing to read "Peter A. Gwynne".

**Re: United States v. Hernando Esteveens Montoya Guzman**  
**1:16-cr-00136-CM-1**

Dear Chief Judge McMahon:

We write on behalf of our client, Hernando Esteveens Montoya Guzman, the defendant in the above-captioned matter. On October 20, 2020, Samidh Guha of this firm was appointed to represent Mr. Guzman in connection with his motion for compassionate release (ECF No. 166). The Court asked us to submit papers in connection with the motion by November 10, 2020. With the consent of the government, we respectfully request an extension of time to file papers concerning the motion. This is our first request for an extension in connection with this matter. This extension of time will not affect any other scheduled date.

As the Court may be aware, Mr. Guzman is currently incarcerated at FCI Fort Dix, New Jersey. Since we were appointed, we made multiple attempts to contact him via the Bureau of Prisons and through Mr. Guzman's family. Today, for the first time, we were able to speak to Mr. Guzman's counselor, as opposed to leaving messages, and were able to schedule a legal call for Tuesday, November 10, 2020. We respectfully request the opportunity to speak with Mr. Guzman, including regarding his efforts to exhaust his administrative remedies (the extent of which is unclear from his motion) in order to assess the appropriate way to proceed on Mr. Guzman's behalf. Because of the challenges associated with setting up legal calls with inmates at FCI Fort Dix and the fact that Mr. Guzman speaks only Spanish (and counsel does not), we anticipate that this process will take more slightly more time than usual. Accordingly, we respectfully request a six-week extension of time, until December 22, 2020, to respond.

The Honorable Colleen McMahon  
November 6, 2020

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

/s/ Peter A. Gwynne

Peter A. Gwynne  
Samidh Guha  
35 East 62nd Street  
New York, New York 10065  
pgwynne@perryguha.com  
sguha@perryguha.com  
(212) 399-8330

cc: All counsel via ECF